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Proposed Attorneys for John Dee Spicer, Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In Re:	§	
	§	
	§	Case No. 22-41804-elm7
ROBERT JORDAN CONSTRUCTION, LLC	§	
	§	
Debtor.	§	No hearing requested.
	§	

**TRUSTEE'S NOTICE OF INTENT TO ABANDON PROPERTY**

**NOTICE**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT ELDON B. MAHON FEDERAL BUILDING, 501 W. TENTH STREET, FORT WORTH, TX 76102 BEFORE CLOSE OF BUSINESS ON SEPTEMBER 7, 2022, WHICH IS FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

John Dee Spicer, Chapter 7 Trustee in this case (the “Trustee”) in the above-referenced bankruptcy case gives this **Trustee’s Notice of Intent to Abandon Property** (the “Notice”) pursuant to 11 U.S.C. § 554(a) and Federal Rule of Bankruptcy Procedure 6007(a) and would respectfully show the Court as follows:

1. The Debtor filed its voluntary petition under Chapter 7 of the Bankruptcy Code on August 9, 2022. Subsequently, John Dee Spicer was appointed as Chapter 7 Trustee.

2. The Debtor leased office space located at 2640 Corzine Drive, Arlington, Texas 76013 (the “Leased Premises”) from John McAndrew dba EST Holdings LLC (the “Landlord”). The Leased Premises contains certain personal property (the “Personal Property”) owned by the Debtor.

3. As part of the Trustee’s investigation into assets of this estate, the Trustee met with Rosen Systems, Inc. (“Rosen”) at the Leased Premises to evaluate the Personal Property. In this regard, Rosen is in the business of marketing and selling property such as the Personal Property. After Rosen’s inspection of the Personal Property, the Trustee and Rosen have determined some of the Personal Property should be sold at a future auction (the “Auction Property”). The Trustee, through Rosen, will remove the Auction Property from the Leased Premises on or before August 30, 2022. The remaining Personal Property, after the Auction Property is removed (the “Abandoned Property”), has been determined by the Trustee and Rosen as not beneficial to be included in an auction to be conducted by Rosen<sup>1</sup> on behalf of the bankruptcy estate (the “Estate”).

4. The Trustee asserts that the Abandoned Property therefore is burdensome to the Estate and of inconsequential value and benefit to the estate. In this regard, Section 554(a) of the Bankruptcy Code allows a Trustee to abandon any property of the Estate that is burdensome to the Estate or that is of inconsequential value and benefit to the Estate. Such is the case with the Abandoned Property.

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<sup>1</sup> The employment of Rosen and the conduct of the auction is subject to approval by the Court.

5. Therefore, the Trustee is giving this notice of his intent to abandon the Estate's interest in the Abandoned Property.

6. The Debtor, through Robert Jordan its member, has informed the Trustee that the Debtor does not intend to take possession of the Abandoned Property.

7. The Trustee has informed the Landlord that it may dispose of the Abandoned Property on and after August 31, 2022.

8. Therefore, the Trustee requests that the abandonment of the Abandoned Property be as of the later of the date of the filing of this Notice or the removal from the Leased Premises of the Auction Property.

Respectfully submitted,

/s/ Leah Duncan

John Dee Spicer

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